RAB Minutes

NAS North Island

Restoration Advisory Board

Subject: RESTORATION ADVISORY BOARD MEETING MINUTES

Thursday January 16, 1997.

The thirty-second Restoration Advisory Board (RAB) meeting for Naval Air Station (NAS) North Island was held on Thursday, January 16, 1997, in the Winn Room at the Coronado Public Library from 6:30 p.m. to 8:30 p.m.

Ms. Dottie Marron, RAB Community Co-Chair, called the meeting to order at 6:36 p.m., and welcomed RAB and community members. Ms. Marron assured public members that comments/questions are welcome any time during the meeting.

Approval of Meeting Minutes from the 12 December 1996 RAB Meeting

Public member Ms. Stephanie Kaupp questioned whether the transcript had been put into the information repository. Mr. Richard Mach, Southwest Division (SWDIV) Remedial Project Manager, explained that the November 7, 1996, transcript was placed in the information repository, but that there was a delay with the preparation of the December 12, 1996, transcript due to an electrical problem with the court reporter's system. Ms. Lana Khoury, the contractor providing community relations support services, added that each transcript will be placed with the appropriate RAB materials (agenda, minutes, and handouts), in binder #4. Ms. Khoury noted that the transcript can be expected in the library 2 to 3 days before the next RAB meeting.

The December 12, 1996, RAB meeting minutes were approved with one abstention.

Closure of Mercury Spill Emergency Removal Action

Ms. Kim Wheeler, SWDIV Remedial Project Manager, provided the RAB with a progress briefing on the mercury spill removal.

- The project team met to review the latest verification sampling results. Based on the results, the removal action was found to have achieved its cleanup goal of restoring the bay sediments to prespill mercury concentrations.
- The decision to conclude the removal action was based on three major pillars:
- 1. Protecting human health and the environment. The latest verification results showed the 95 percent confidence interval median value to be 0.55 parts per million (ppm) of mercury, well below the 0.71 ppm cleanup goal.
- 2. Technically defensible documentation. A California-state certified laboratory was always used, data interpretation of results was done using standard statistical techniques, verification sampling results from previous dredge rounds showed an overall decreasing trend in the average mercury concentration, and waste characterization conducted on the sediments showed a decreasing trend

in mercury concentration.

- 1. Consistency and practicality. The spill site was restored to pre-spill/background conditions, ongoing feasibility studies were conducted to ensure the most practical cleanup techniques were being employed, and comparison of verification sampling showed that further remediation would be ineffective and impractical.
- The maximum concentration of mercury detected from all dredged sediment was 542 ppm. According to regulations, when the value of mercury is that high, a leachate test (TCLP) is required to see if any of that mercury will leak out of the soil due to rain and seep into groundwater. In this case, the Navy did not fail the TCLP test.
- There have been no injuries, no accidents, and no spills. The total waste generated to date (not including demobilization) is 575 tons of sediment, 60 percent of which has been transported off the base to a hazardous waste landfill via truck. Also produced were 1.5 million gallons of water (free of chemicals), which were discharge down the sanitary sewer. The total estimated cleanup cost is \$1.75 million.
- The project team plans to continue demobilization, characterize the remaining waste for off-site disposal or sewer discharge, and prepare a Removal Closeout Report for 30-day review beginning in February 1997 (it will be placed in the information repositories).

Answering a question posed by RAB member Mr. Clay Kordahl, Ms. Wheeler informed Mr. Kordahl that 8 to 10 pounds of mercury (2 cups), not 24 pounds, were originally spilled into the bay, and that there is no way to figure out how much mercury was recovered unless the team tried to recycle it. Since such a small amount was spilled, it wouldn't be worth the equipment, labor, and time.

Answering a question posed by RAB member Mr. Larry McCauley, Ms. Wheeler noted that confirmation sampling was conducted after every round of dredging, over the whole site. Ms. Wheeler said she would present the RAB with lab fees and other financial details in the Closeout Report.

Presentation on Barging option

Captain Ray Mello answered RAB questions regarding the option of barging.

- When barging is the chosen form of transporting, more risks are introduced, more regulators are required, and stricter safety procedures must be implemented.
- The current practice entails transporting waste in safe, approved vehicles (trucks), through limited and prescribed routes (usually not through neighborhoods), during the least inconvenient time (set up by the City), to certified landfills.

Mr. Mach informed public member Ms. Jennifer Casales that landfills and incinerators used by the Navy are located in Utah, Bakersfield California, Texas, and several other sites. Capt. Mello added that all facilities used are approved and regulated.

Capt. Mello illustrated that the Navy's job is National Defense, and therefore, when cleanup is necessary, the Navy asks companies (in that industry) to put in a bid; the business with the lowest bid wins the job. Capt. Mello assured the RAB that the Navy investigates the companies before considering employment; they must be certified and reputable.

Answering questions posed by Ms. Gill and Ms. Hunter, Mr. Mach pointed out that chemicals transported at the same time may be different, but must belong within the same family. For example, gasoline,

petroleum and diesel-containing bins can be hauled together.

Mr. Bacon was worried about potential truck accidents on the Coronado bridge, where there are many people, and believed it would be safer if bins were transported in a vessel (barge) to a less populated location and then put on trucks. Capt. Mello disagreed, stating that the biggest risk is when waste is put onto a barge and double handled.

Responding to comments made by Mr. Kordahl, Capt. Mello reiterated that if there was a certified waste hauler willing to barge from NAS North Island, the company would be allowed to bid with other companies. Capt. Mello agreed that barging large amounts of harmless elements such as sand would be more feasible, however, there are few vendors qualified to do so.

Ms. Hunter felt it would help clarify the discussion if materials were grouped in three categories: nonhazardous, non toxic construction materials, hazardous waste coming on and off the base, and hazardous waste coming off the Installation Restoration (IR) sites. Ms. Hunter pointed out that barging hazardous materials may be more convenient for neighborhood residents, but that a spill in the water could cause a bigger, and more expensive problem (i.e. look at the remediation cost of the 8-10 pounds of mercury spill in the bay vice if it had been spilled on soil). Ms. Hunter encouraged the Navy to try to reduce the number of trucks used to transport materials through Coronado by allowing benign construction materials (sand and rocks) to be barged.

Capt. Mello informed RAB members that the Navy does attempt to lessen the number of truck loads. Currently, there is a program called NAV express, whereby material received by the Navy at the Fleet Industrial Supply Center (FISC) are consolidated at FISC before transporting to NAS North Island. Also, an oily waste plant is being built on Naval Station, San Diego (32nd street), so that particular waste will not need to be transported to NAS North Island in the future.

Mr. Mach pointed out that landfills used are mostly inland, making it impossible to barge material directly to the landfill and in most cases increasing the transportation distance. This will increase the potential for a spill to occur, increase cost, and increase pollution to the atmosphere from truck and barge propulsion (i.e. more exhaust).

Ordnance Emergency Removal Action, Eel grass Mitigation Site

Mr. Mach explained that as part of the CVN home porting project, soil was hauled from the eel grass mitigation area to build a dike. By the end of November 1996, 25,000 yards of soil were disposed of in this area. In the process of moving this soil, some buried ordnance was discovered.

- The ordnance found consists of the explosive portion of a World War II barrage rocket. The pieces of ordnance found do not have the detonators nor the rocket motors attached. Mr. Mach handed around a dart which simulates the ordnance found where the front tip of the dart would be the detonator, the "meat" of the dart represents the pieces found to date (the rocket head), and the flights on the dart represent the rocket motor.
- The soil removal temporarily ceased, while the mitigation site was searched for more ordnance. Testing was also done to ensure that none of the TNT had leaked out of the rocket heads.
- Because the Navy believes this is a one-time spill, the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA) process is being followed with the ordnance removal being conducted as an emergency removal action. Bechtel National, Inc., is writing the Action Memorandum (due out by January 23, 1997, 60 days from the time the first ordnance was discovered) and the Navy is establishing an administrative record. The Action Memorandum will

be out for a 30-day public comment period (a copy will be placed in the information repository).

Mr. Mach introduced Mr. Pete Porter, Environmental Division, Staff Civil Engineering. The following is a summary of Mr. Porter's presentation.

- To date, 53 rocket heads have been found. The rocket head is 13 inches long, 4.5 inches in diameter, contains 6.5 pounds of TNT (a stable explosive meant to be handled in the field), and weighs approximately 19.9 pounds (total weight).
- The area where the ordnance was found was originally filled with dredge spoil from 1933 to 1937. The ordnance is World War II vintage, evidently buried sometime after 1937. Who buried them, when, and why is unknown. The buried ordnance poses a safety/explosive hazard to employees working heavy equipment.

Mr. Porter explained to Ms. Hunter that although the bombs need a detonator to explode, if sufficient heat, shock, or friction is created through an accident (heavy equipment running into an ordnance or crushing it), they could burn and explode.

- After the initial 6 rocket heads were removed by Explosive Ordnance Disposal Mobile Unit 3 Detachment, NAS North Island, a total of 23 more ordnance items were found. Wyle Laboratories, a professional contractor, was asked to remove ordnance units from the rest of the site. They have been working since December 17, 1996, and are expected to be completed in mid February 1997. Wyle personnel have recovered an additional 24 rocket heads.
- To make sure there is no potential residual ordnance contamination, soil screening is being conducted.

Mr. Porter informed public member Ms. Ginna McDonough that the mitigation area is approximately 13 acres. Mr. Porter illustrated to Mr. Bacon that a sophisticated and sensitive magnetometer is used to sweep the ground searching for buried ordnance. The machine makes a map of any unusual magnetic field past the background levels, and charts unknown magnetic objects. A hand-held magnetometer is then used to pinpoint the exact location and depth. To ensure safety, hand tools are used to dig down to the ordnance.

Answering a question posed by RAB member Mr. Art Van Rooy, Mr. Porter noted that the contractor is confident the magnetometer reads 10 feet below ground. However, from a safety stand point, the Navy accepts 6 feet of that estimate. To add another safety margin, the Navy allows the contractor to excavate 5 feet, in other words, taking half of what they originally estimated could be detected.

Answering a question posed by Mr. Charles Cheng, of the Regional Water Quality Control Board (RWQCB), Mr. Porter noted that the average depth of removed ordnance was 1.5 feet to 2.5 feet below ground surface. Mr. Porter informed Ms. Marron that the cleanup action is only taking place at the eel grass mitigation site and thus far there are no plans to excavate other areas beyond this site.

Mr. Porter informed Mr. Sandor Kaupp, representing RAB member Mr. Richard Dittbenner, that no historical searches or interviews were done to further investigate why these bombs were buried. Mr. Mach added that the initial assessment study from 1983 and the Resource Conservation and Recovery Act (RCRA) facility assessment done by the Department of Toxic Substances Control (DTSC) in 1989 (containing interviews with EOD and weapons personnel) were re-reviewed, but revealed no indication of knowledge of buried ordnance.

• The Navy has several concerns regarding this investigation including: reducing hazards and limiting them to the on-site area, using the best and safest technology to remove the bombs, using

only EOD trained personnel for the removal, and restricting the access to the area during removal operations (shut down roads, and restrict bay activity).

Ms. Marron felt the Navy was being very careful with their cleanup of this site, however, she believed there should be further investigation of how far the buried ordnance extends beyond the 13 acres.

- Environmental concerns include potential contamination from TNT. The soil is sampled and tested for nitroaromatics and TNT contamination using EPA test method 8515.
- As an additional safety precaution, the excavated soil is screened through a 4-inch mesh screen where any material (larger than sand) is caught and removed prior to transport on the station.

Ms. Hunter urged the Navy to test the area for heavy metals and radioactivity. Mr. Porter noted that thus far no indication of a need to test for radioactivity has been found. Mr. Porter illustrated to Ms. Kaupp that some rocket heads have been found open, but that TNT is not readily soluble in water and no contamination has been detected in the many samples analyzed to date.

To address the concerns of several public members, Ms. Hunter suggested that split-sampling be conducted by a third party, not related to the Navy. Mr. Greig Peters, RWQCB, agreed to do so after he looks through the original environmental impact values.

Ms. McDonough felt that the Navy's comment that there are no hazards outside the immediate mitigation area is premature in this stage of the investigation. Mr. Porter clarified that the hazards found in the mitigation area will not migrate passed the bounds of the 13 acre site. Mr. Mach added that the fragmentation distance of the rocket heads is 926 feet, therefore, the contractor keeps a 1,000-foot radius around the site where no equipment, or people, are permitted.

Ms. Hunter could not see how this procedure met standards for an emergency removal action; she believed the Navy's only concern was to comply with the CVN home porting project time schedule.

Ms. Kaupp referred to a comment made by public member, Ms. Betsy Gill, indicating that an ordnance was found in the bay during the summer of 1996. Ms. Kaupp wondered why the investigation is taking place now, as opposed to then. Mr. Porter was not aware of any ordnance found during the summer, but said he would look into it. Ms. Marron suggested a follow-up presentation be given to the RAB at the next meeting.

Toxic Hot spots on Installation Restoration Sites

Ms. Rosa Salcedo, San Diego Air Pollution Control District (APCD), gave a presentation on the process the district takes when they receive an application/evaluation for an IR site or other project.

- When APCD receives an application or IR site review, they conduct an evaluation of the project
 for compliance with all prohibitory rules, and emittence of toxic air contaminants. APCD first
 identifies the toxic. If a toxic exists, then they conduct a screening health risk assessment (estimate
 the possibility of an increased adverse health risk to an individual from exposure to this
 contaminant).
- A health risk assessment consists of four steps: 1. identifying the hazard, whereby the Environmental Protection Agency (EPA), or the state has done a study and determined that the chemical is toxic; 2. conducting a dose response assessment, which entails finding a relationship between the amount/concentration of the toxic and the likelihood/type of health effects; 3. exposure assessment, where the district estimates the amount of a contaminant an individual will

likely be exposed to. The different factors involved in determining this are the emission rate, the distance of the source from the individual, the stack height, and the wind speed/direction; and 4. characterizing the risk, which involves looking at the dose response assessment and the exposure assessment.

- The number reached as a result of risk characterization becomes the criteria to evaluate for Rule 1200 (toxic resource rule). The rule indicates that if a unit does not have toxics best available control technology installed, the acceptable maximum incremental cancer risk will be one in a million, however, if the unit does have toxics best available control technology installed, then the acceptable maximum incremental cancer risk is ten in a million.
- Ten in a million means an individual's increased probability of getting cancer is ten in one million. The numbers estimated are very conservative; the risk assessment assumes that a person is exposed to the toxic 24 hours-a-day, 365 days-a-year, for 70 continuous years.

Responding to a question posed by Ms. McDonough, Ms. Salcedo explained that emission reduction credits work when one company reduces emissions, banks those reductions as credits, and allows another business to buy needed credits from their banked credits. This ensures that the pollution in the basin is not increased while still allowing new business to enter San Diego. The credits are not permission to pollute. The company purchasing the credits must still adhere to all of the other district rules and install the best available control technology.

Ms. Salcedo explained to Mr. Bacon that unfortunately, there are only 8 air monitoring stations in San Diego County, with no current plans to add more. Ms. Salcedo added that since the air blows east, Coronado has some of the better air in the county.

Ms. Salcedo assured Ms. Hunter that EPA is developing regulations to test for particulate PM 2.5 in the air.

Answering a question by Ms. Gill, Ms. Salcedo illustrated that along with testing for cancer risks, risk assessments are performed for noncancer toxic air contaminants that may cause effects such as emphysema.

Ms. Hunter, and the Environmental Health Coalition, are opposed to pollution trading (banking and selling of emission reduction credits). Ms. Hunter was disappointed that other environmental organizations would support this process.

New RAB Member Voting

The application of Mr. Sandor Kaupp was mailed to RAB members for their review. RAB members voted and welcomed Mr. Kaupp as a new RAB member.

Ms. Marron announced that RAB member Mr. George Cooksey had passed away in December. A discussion ensued about Mr. Cooksey's dedication to the RAB and his life experiences. Ms. Marron agreed to write a letter to Mrs. Cooksey on behalf of the RAB expressing appreciation for the hours and interest that Mr. Cooksey gave to the RAB.

Mr. Arno Bernardo, RAB Navy Co-Chair, pointed out that several RAB members have not been attending meetings regularly, and suggested a follow-up on their membership. Ms. Marron agreed to send a letter to said RAB members asking them if they are still interested in the RAB, then, the RAB can vote on further action at the next meeting. Mr. Bernardo reiterated that the RAB needs to expand and include more diversity.

Ms. Hunter invited RAB attendees to the first Imperial Beach Birdfest.

Mr. Bacon informed RAB members that a scoping meeting will be held on February 10, 1997, at 7:00 at the Village School.

Mr. Mach declared that a new contract for RAB support had been awarded; Ms. Vivian Mayer will be overseeing the RAB starting with the February meeting.

The next RAB meeting is scheduled for 19 February 1997, from 6:30 p.m. to 8:30 p.m. in the Winn Room at the Coronado Public Library.

Ms. Marron adjourned the meeting at 8:25 p.m.